

Banco del Austro, S.A. v. Wells Fargo Bank, N.A.,
Case No. 16-cv-00628 (LAK) (S.D.N.Y.)

Joint Pretrial Order Exhibit B

DEFENDANT WELLS FARGO BANK, N.A.'S EXHIBIT LIST

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-1	Banco del Austro Ex. 1	8/1/2016	Amended Notice of Deposition of Banco del Austro, S.A. Pursuant to Federal Rule of Civil Procedure 30(b)(6), <i>Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.</i> , No. 16-cv-00628 (LAK) (S.D.N.Y.)		
DX-2		4/3/2017	Banco del Austro, S.A.'s Responses and Objections to Defendant Wells Fargo Bank, N.A.'s First Set of Interrogatories, <i>Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.</i> , No. 16-cv-00628 (LAK) (S.D.N.Y.)		
DX-3		8/14/2017	Banco del Austro, S.A.'s Responses and Objections to Defendant Wells Fargo Bank, N.A.'s Second Set of Interrogatories, <i>Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.</i> , No. 16-cv-00628 (LAK) (S.D.N.Y.)		
DX-4		8/14/2017	Banco del Austro, S.A.'s Second Supplemental Initial Disclosures, <i>Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.</i> , No. 16-cv-00628 (LAK) (S.D.N.Y.)		
DX-5		8/14/2017	Banco del Austro, S.A.'s Responses and Objections to Defendant Wells Fargo Bank, N.A.'s Requests for Admission, <i>Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.</i> , No. 16-cv-00628 (LAK) (S.D.N.Y.)		

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-6		8/30/2017	Banco del Austro, S.A.'s Supplemental Responses and Objections to Defendant Wells Fargo Bank, N.A.'s Second Set of Interrogatories, <i>Banco Del Austro, S.A. v. Wells Fargo Bank, N.A.</i> , No. 16-cv-00628 (LAK) (S.D.N.Y.)		
DX-7	Hershkop Ex. 6	Current as of 8/2017	New York Uniform Commercial Code § 4-A-201		
DX-8	Doyle Ex. 3	Current as of 8/2017	New York Uniform Commercial Code §§4-A-202 – 203 with Commentary		
DX-9	Hershkop Ex. 1; Wells Fargo Ex. 4	Current as of 8/2017	New York Uniform Commercial Code § 4-A-202		
DX-10	Hershkop Ex. 5	Current as of 8/2017	New York Uniform Commercial Code § 4-A-203 with Commentary		
DX-11		6/12/2015	Banco del Austro's Application and Supporting Memorandum of Law for Discovery Assistance in Pending Litigation in Hong Kong, <i>In re: Application of Banco del Austro, S.A.</i> (S.D. Fla.)	BDA00001-BDA00013	
DX-12	Banco del Austro Ex. 12	2/2/2011	Terms & Conditions for the Correspondent Agreement Between Wells Fargo Bank, N.A. and Banco del Austro, S.A.	BDA00072-BDA00091	
DX-13	Hershkop Ex. 7; Banco del Austro Ex. 3	4/1/2015	Banco del Austro, S.A. Report on Hacking	BDA00109-BDA00127	
DX-14		Undated	Banco del Austro, S.A. Report on Hacking	BDA00128-BDA00138	
DX-15		Undated	Banco del Austro, S.A. Report on Hacking	BDA00139-BDA00147	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-16		Undated	Banco del Austro, S.A. Report on Hacking	BDA00148-BDA00160	
DX-17		Undated	Banco del Austro, S.A. Report on Hacking	BDA00161-BDA00170	
DX-18		7/1/2015, 8/1/2015	Banco del Austro, S.A. screenshot containing information regarding Symantec Endpoint Protection	BDA00171	
DX-19	Banco del Austro Ex. 2	7/1/2015, 8/1/2015	Banco del Austro, S.A. documents regarding Symantec Endpoint Protection	BDA00172-BDA00177	
DX-20		11/30/2016	Banco del Austro, S.A. Report titled "Imágenes Equipos: Caso Swift"	BDA00178-BDA00197	
DX-21		4/30/2015	Email from Fernando Aguilar to Fernando Calugullin with the subject line "Enviando por correo electrónico: para revision.rar"	BDA00198-BDA00207	
DX-22	Banco del Austro Ex. 7	4/2/2009	TurboGateway Service Bureau Agreement between Banco del Austro, S.A. and BServ, Inc.	BDA00276-BDA00307	
DX-23		1/12/2015-1/16/2015	Copies of SWIFT messages from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00308-BDA00319	
DX-24		1/2/2014-12/30/2014	Banco del Austro, S.A. payment order history spreadsheet	BDA00320	
DX-25	Banco del Austro Ex. 5	11/28/2016	SWIFT Customer Security Intelligence: Forensics Report	BDA00642-BDA00653	
DX-26		7/30/2015	Letter from Guillermo Talbot to Patricio Sanchez	BDA00654	
DX-27		3/3/2017	SWIFT FIN Investigation Report	BDA00655-BDA00717	
DX-28		1/6/2014-1/20/2015	Banco del Austro, S.A. payment order history spreadsheet	BDA00718	
DX-29		12/8/2014	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00855	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-30		12/11/2014	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00856	
DX-31		12/12/2014	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00857	
DX-32		12/15/2014	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00858	
DX-33		12/23/2014	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00859	
DX-34		12/19/2014	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00860	
DX-35		1/12/2015	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00861	
DX-36		1/14/2015	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00862	
DX-37		1/16/2015	Copy of SWIFT message from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	BDA00863	
DX-38		12/15/2004	BServ, Inc. and Banco del Austro, S.A. Software License Agreement	BDA00864- BDA00875	
DX-39		5/26/2015	Second Affirmation of Leung Ka Ying, In the High Court of the Hong Kong Special Administrative Region, Court of First Instance, Action No. 477 of 2015	BDA00876- BDA00902	
DX-40		3/5/2015	Affirmation of Leung Ka Ying, In the High Court of the Hong Kong Special Administrative Region, Court of First Instance, Action No. 477 of 2015	BDA01067- BDA01082	
DX-41		3/5/2015	Affirmation of Leung Ka Ying, In the High Court of the Hong Kong Special Administrative Region, Court of First Instance, Miscellaneous Proceedings No. 543 of 2015	BDA01083- BDA01098	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-42		6/25/2015	Decision, In the High Court of the Hong Kong Special Administrative Region, Court of First Instance, Action No. 477 of 2015	BDA01107-BDA01141	
DX-43		5/8/2015	Notice by Plaintiff of Discontinuance of Action Against the Third Defendant, In the High Court of the Hong Kong Special Administrative Region, Court of First Instance, Action No. 477 of 2015	BDA01347-BDA01349	
DX-44		4/28/2015	Statement of Claim, In the High Court of the Hong Kong Special Administrative Region, Court of First Instance, Action No. 477 of 2015	BDA01636-BDA01644	
DX-45	Banco del Austro Ex. 4	4/1/2015	Paul Ochoa, Final Report on Systems Audit	BDA01687-BDA01693	
DX-46		3/30/2015	Settlement Agreement between Banco del Austro, S.A. and JGM Asia Telcom Limited	BDA01694-BDA01701	
DX-47		1/2/2007-12/30/2013	Banco del Austro, S.A. payment order history spreadsheet	BDA01776	
DX-48		12/1/2016	SWIFT Customer Security Intelligence: Forensics Report	BDA08504-BDA08515	
DX-49		9/16/2016	TurboSWIFT User Manual	DH00000255-DH00000607	Irrelevant, and immaterial.
DX-50		12/18/2015	TurboSWIFT Reference Guide	DH00001779-DH00002072	Irrelevant, and immaterial.
DX-51		9/2/2014	TurboSWIFT Reference Guide	DH00002073-DH00002360	Irrelevant, and immaterial.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-52		1/23/2015	Email from Anthony Middleton to Susana Cires, Kenneth Clinkscale, Ousmane Dieme, Lorena Castillo, Marvisa Gallman, Rafael Diaz, Bob Black, and Urgent Case Americas with the subject line "Suspected Fraud/Banco del Austro/High Amount"	WF00000073-WF00000077	
DX-53		1/21/2015-2/3/2015	Copies of SWIFT messages from Wells Fargo Bank, N.A. to Banco del Austro, S.A.	WF00001896-WF00002314	
DX-54		1/22/2015	Email from Rafael Diaz to James McGinlay with the subject line "Escalation: Suspected Fraud Notification from Rep Office on High Dollar Transactions"	WF00003104-WF00003105	
DX-55		4/9/2015	Email from Charles Avaunzaff to Ronald Caton, Charles Kohler, Gisele Luna De Mello, and Carlos Singer with the subject line "GPS Fee-Revenues YTD February 2015 versus YTD February 2014"	WF00003302-WF00003309	Irrelevant, and immaterial.
DX-56		3/22/2017	Matt Spada, Spreadsheet titled "Banco Austro Activity History"	WF00003341	
DX-57	Gueguen Ex. 4; Banco del Austro Ex. 9	8/6/2013	SWIFT Handbook – Subsection titled, "Network Access Control Guide"	WF00003552-WF00003589	Irrelevant, and hearsay.
DX-58		1/9/2015	SWIFT Handbook – Subsection titled, "Connectivity to SWIFT – Connectivity Packs"	WF00003590-WF00003617	Irrelevant, and hearsay.
DX-59		2/12/2015	Email from Hernando Torres to Susana Cires, Terry Sanda, and Lorena Castillo with the subject line "Austro Cyber Pay Immediate Deactivation Request," with attachment titled "Assigned Roles Report"	WF00003633-WF00003640	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-60	Banco del Austro Ex. 13	2/12/2015	Email from Terry Sanda to Susana Cires, Yoko Horio, Lorena Castillo, Christine Jenkins, Ashia Kennon, and Riitta Vaughn with the subject line “Austro Cyber Pay Immediate Deactivation Request,” with attachment titled “User Summary Report”	WF00003641-WF00003652	
DX-61		3/4/2015	Wells Fargo Bank, N.A., Activity in Account # 2000192000709, January 2, 2015 through January 30, 2015	WF00003736-WF00004324	
DX-62	Wells Fargo Ex. 8	1/27/2015	Anthony Middleton, Spreadsheet titled “Banco del Austro Fraud Spreadsheet”	WF00004534	
DX-63		3/25/2015	Wells Fargo Bank, N.A., Account statements for Banco del Austro, S.A., August 31, 2011 through March 25, 2015	WF00004535-WF00010481	
DX-64		7/25/2014	SWIFT Handbook – Subsection titled, “FIN System Messages”	WF00010482-WF00010665	Irrelevant, and hearsay.
DX-65		11/4/2016	SWIFT Handbook – Subsection titled, “Certified Customer Managed Interface for Connectivity to SWIFT – Security Guidance”	WF00010666-WF00010709	Irrelevant, and hearsay.
DX-66	Gueguen Ex. 3	8/14/2014	SWIFT Handbook – Subsection titled, “FIN Operations Guide”	WF00010710-WF00010810	
DX-67		8/14/2014	SWIFT Handbook – Subsection titled, “FIN Service Description”	WF00010811-WF00010890	Irrelevant, and hearsay.
DX-68		7/25/2014	SWIFT Handbook – Subsection titled, “Category 1 – Customer Payments and Cheques Message Reference Guide”	WF00010891-WF00011305	Irrelevant, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-69		7/27/2012	SWIFT Handbook – Subsection titled, “SWIFTNet Link 7.0 Service Description”	WF00011306-WF00011334	Irrelevant, and hearsay.
DX-70		7/25/2014	SWIFT Handbook – Subsection titled, “SWIFTNet Certificate Administration Guide”	WF00011335-WF00011389	Irrelevant, and hearsay.
DX-71	Gueguen Ex. 5; Banco del Austro Ex. 10	2/21/2014	SWIFT Handbook – Subsection titled, “SWIFTNet Service Description”	WF00011390-WF00011530	Irrelevant, and hearsay.
DX-72	Banco del Austro Ex. 8	1/1/2013	SWIFT Handbook – Subsection titled, “General Terms and Conditions”	WF00011531-WF00011555	Irrelevant, and hearsay.
DX-73		5/2016	SWIFT Corporate Brochure	WF00011556-WF00011578	Irrelevant, and hearsay.
DX-74		5/2016	SWIFT Annual Review 2015	WF00011579-WF00011597	
DX-75		4/29/2011	SWIFT Messaging Services	WF00011598-WF00011605	
DX-76		9/30/2016	SWIFT Handbook – Subsection titled, “SWIFTNet PKI Service Description”	WF00011606-WF00011665	Irrelevant, and hearsay.
DX-77		7/22/2016	SWIFT Handbook – Subsection titled, “FIN Service Description”	WF00011666-WF00011748	Irrelevant, and hearsay.
DX-78		5/15/2014	Enrique Sarmiento Cobos, The Wolfsberg Group Anti-Money Laundering Questionnaire for Banco del Austro, S.A.	WF00011750-WF00011752	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-79		1/12/2015-1/22/2015	Copies of SWIFT messages from Banco del Austro, S.A. to Wells Fargo Bank, N.A.	WF00011761-WF00011928	
DX-80		1/12/2015-2/3/2015	Copies of SWIFT messages from Wells Fargo Bank, N.A. to Banco del Austro, S.A.	WF00011929-WF00012246	
DX-81		1/16/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (Transaction Reference Number ("TRN"): CEX2015011645215)	WF00012319	
DX-82		1/14/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: 1501141844201458)	WF00012320	
DX-83		1/14/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: CAMGYE1501144856)	WF00012321	
DX-84		1/13/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: 1501131842201430)	WF00012322	
DX-85		1/13/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: CAMGYE1501132050)	WF00012323	
DX-86		1/15/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: 1501142514368542)	WF00012324	
DX-87		1/13/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: CAMGYE1501132053)	WF00012325	
DX-88		1/12/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: 150112185203108C)	WF00012326	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-89		1/12/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: 150112191227108C)	WF00012327	
DX-90		1/20/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: GYE2015012015263)	WF00012328	
DX-91		1/16/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: CAMGYE2015011645)	WF00012329	
DX-92		1/16/2015	SWIFT MT103 message from Banco del Austro, S.A. to Wells Fargo Bank, N.A. (TRN: CAMGYE1501160052)	WF00012330	
DX-93		4/9/2012	Wells Fargo Bank, N.A., CRMS Report on Banco del Austro, S.A.	WF00018742- WF00018758	
DX-94		8/2/2012	Guillermo Talbot Dueñas, Anti-Money Laundering Questionnaire on Banco del Austro, S.A.	WF00018760- WF00018766	
DX-95		3/18/2014	Wells Fargo Bank, N.A., Compliance Call Memo on Banco del Austro, S.A.	WF00018774- WF00018777	
DX-96		7/25/2014	Enrique Sarmiento Cobos, Anti-Money Laundering Questionnaire on Banco del Austro, S.A.	WF00018780- WF00018785	
DX-97		6/27/2011	Wells Fargo Bank, N.A., Banco del Austro, S.A. Foreign Financial Institution Profile Annual Update	WF00018802- WF00018821	
DX-98		7/24/2010	Wells Fargo Bank, N.A., Relationship Memo on Banco del Austro, S.A.	WF00018822- WF00018833	
DX-99		6/14/2011	Enrique Sarmiento Cobos, Anti-Money Laundering Questionnaire for Banco del Austro, S.A.	WF00018841- WF00018848	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-100		1/29/2010	Guillermo Talbot, Anti-Money Laundering Questionnaire for Banco del Austro, S.A.	WF00018849-WF00018854	
DX-101		6/10/2013	SWIFT BIC Search for Banco del Austro	WF00019006	
DX-102		4/5/2013	Wells Fargo Bank, N.A., Compliance Call Report on Banco del Austro, S.A.	WF00019035-WF00019039	
DX-103		4/18/2012	Wells Fargo Bank, N.A., Compliance Call Report on Banco del Austro, S.A.	WF00019040-WF00019044	
DX-104		12/31/2013	Wells Fargo Bank, N.A., Relationship Memo on Banco del Austro, S.A.	WF00019095-WF00019119	
DX-105		5/28/2012	Wells Fargo Bank, N.A., Relationship Memo on Banco del Austro, S.A.	WF00019120-WF00019146	
DX-106		8/26/2014	Wells Fargo Bank, N.A., Spreadsheet showing activity in Account # 2000192000709, January 2, 2013 through June 30, 2014	WF00019166	
DX-107		3/19/2014	Wells Fargo Bank, N.A., Spreadsheet showing activity in Account # 2000192000709, February 7, 2012 through December 31, 2013	WF00019168	
DX-108		11/22/2010	Wells Fargo Bank, N.A., Foreign Financial Institution Profile for Banco del Austro, S.A.	WF00019286-WF00019304	
DX-109		2009-2010	Wells Fargo Bank, N.A., Spreadsheet titled "Compliance – International Correspondent Sub-Product Monthly Volumes – By Customer"	WF00019305-WF00019307	
DX-110		7/28/2009	Wells Fargo Bank, N.A., Foreign Financial Institution Profile for Banco del Austro, S.A.	WF00019311-WF00019339	
DX-111		1/23/2009	Wells Fargo Bank, N.A., Foreign Financial Institution Profile for Banco del Austro, S.A.	WF00019340-WF00019359	
DX-112		12/4/2007	Wells Fargo Bank, N.A., Foreign Financial Institution Profile for Banco del Austro, S.A.	WF00019360-WF00019377	
DX-113		12/28/2006	Wells Fargo Bank, N.A., Foreign Financial Institution Profile for Banco del Austro, S.A.	WF00019378-WF00019393	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-114		6/9/2003	Wells Fargo Bank, N.A., Foreign Financial Institutions Customer Profile for Banco del Austro, S.A.	WF00019403-WF00019411	
DX-115		1/28/2002	Wells Fargo Bank, N.A., Global and Domestic Institutions KYC Customer Profile Memo on Banco del Austro, S.A.	WF00019450-WF00019455	
DX-116		6/2/2000	Wells Fargo Bank, N.A., Global and Domestic Institutions KYC Customer Profile Memo on Banco del Austro, S.A.	WF00019456-WF00019460	
DX-117		7/24/2010	Wells Fargo Bank, N.A., Relationship Memo for Banco del Austro, S.A.	WF00019461-WF00019472	
DX-118		7/1/2010	Lorena Castillo, Summary of meeting between Lorena Castillo, Maria Jose Veintimilla, and Enrique Sarmiento	WF00019484-WF00019490	
DX-119		1/16/2014	Litan, A., Gartner, "Reality Check on Big Data Analytics for Cybersecurity and Fraud."	WF00019503-WF00019515	Authentication, irrelevant, and hearsay.
DX-120		8/25/2014	Litan, A. and Nicolett, M., Gartner, "Market Guide for User Behavior Analytics."	WF00019516-WF00019521	Authentication, irrelevant, and hearsay.
DX-121		11/2016	Araneta, M., DeCastro, M., Fearnley, B., and Silva, J., IDC, "IDC FutureScape: Worldwide Financial Services 2017 Predictions"	WF00019522-WF00019538	Authentication, irrelevant, and hearsay.
DX-122		9/2009	Chandola, V., Arindam B., and Kumar, V., ACM Computing Survey, "Anomaly Detection: A Survey"	WF00019539-WF00019596	Authentication, irrelevant, and hearsay.
DX-123		7/17/2017	EUR-USD Currency 2007-2016, retrieved from Bloomberg on July 17, 2017	WF00019597-WF00019706	Authentication, irrelevant, and hearsay.
DX-124		10/3/2014	SWIFT Handbook – Subsection titled, "Shared Infrastructure Policy"	WF00019707-WF00019716	Irrelevant, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-125		10/3/2014	SWIFT Handbook – Subsection titled, “Shared Infrastructure Programme Terms and Conditions”	WF00019717-WF00019765	Irrelevant, and hearsay.
DX-126		7/17/2017	SWIFT MT103s greater than \$1 million received by Wells Fargo Bank, N.A. at PNBPUS33 and PNBPUS3N BIC-8 addresses	WF00019766	Authentication, irrelevant, and hearsay.
DX-127		2012	Russinovich, M., Solomon, D., and Ionescu, A., “Windows Internals,” 6th ed.	WF00019767-WF00019848	Authentication, irrelevant, and hearsay.
DX-128		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY502121411	WF00020033-WF00020051	
DX-129		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502121961	WF00020052-WF00020100	
DX-130		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220008	WF00020101-WF00020131	
DX-131		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220009	WF00020132-WF00020178	
DX-132		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220010	WF00020179-WF00020225	
DX-133		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220011	WF00020226-WF00020277	
DX-134		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220012	WF00020278-WF00020302	
DX-135		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220013	WF00020303-WF00020357	
DX-136		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220095	WF00020358-WF00020403	
DX-137		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220178	WF00020404-WF00020462	
DX-138		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502220701	WF00020463-WF00020476	

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-139		8/9/2017	Wells Fargo Bank, N.A., Intellitracs file for Case ID # WACNY1502221524	WF00020477-WF00020504	
DX-140		Undated	“About IDC,” IDC, available at http://www.idc.com/about/about.jsp .		Authentication, and hearsay.
DX-141		Undated	<i>About</i> , InfoSphere Business Alerts and Intelligence, http://infospherebusinessalerts.blogspot.com/p/about.html#.WWkf5YTyu71		Authentication, and hearsay.
DX-142		12/7/2001	“A Case for Centralized Logging,” available at http://ebuzzsaw.com/whitePapers/Case_for_Centralize_Logging.htm		Authentication, and hearsay.
DX-143		1/14/2015	Ahmed, M., Mahmood, A., and Islam, M., “A survey of anomaly detection techniques in financial domain,” Future Generation Computer Systems 55, available at https://pdfs.semanticscholar.org/4ac6/64b5133cd0e94047f52f3b2c99eb257ae76d.pdf		Authentication, and hearsay.
DX-144		Undated	Atelier Web, “Products,” available at http://www.atelierweb.com/products/		Authentication, and hearsay.
DX-145		Undated	Audit My PC, “TCP 53,” available at http://www.auditmypc.com/tcp-port-53.asp		Authentication, and hearsay.
DX-146		2/16/2017	Avi Kak, Purdue University, Lecture 12: Public-Key Cryptography and the RSA Algorithm, available at https://engineering.purdue.edu/kak/compsec/NewLectures/Lecture12.pdf		Authentication, and hearsay.
DX-147		12/29/2005	Burt Kaliski, RSA Laboratories, The Mathematics of the RSA Public-Key Cryptosystem, available at http://www.mathaware.org/mam/06/Kaliski.pdf		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-148		1/11/2010	Business Insider, "How to Create a Reverse Shell to Remotely Execute Root Commands Over Any Open Port Using NetCat or BASH," available at http://www.businessinsider.com/how-to-create-a-reverse-shell-to-remotely-execute-rootcommands-over-any-open-port-using-netcat-or-bash-2012-1		Authentication, and hearsay.
DX-149		7/3/2012	Castle, D., <i>How Safe is that Bank Transfer? SWIFT Becomes a Hackers' Paradise</i> , Infosphere Business Alerts and Intelligence, http://infospherebusinessalerts.blogspot.com/2012/07/how-safe-is-that-bank-transfer-swift.html		Authentication, and hearsay.
DX-150		10/13/2008	Cisco, "How Virtual Private Networks Work," available at https://www.cisco.com/c/en/us/support/docs/security-vpn/ipsec-negotiation-ike-protocols/14106-how-vpn-works.pdf		Authentication, and hearsay.
DX-151		5/25/2016	Cisco, "Tuning Traffic Flow Using Access Control Rules," available at https://www.cisco.com/c/en/us/td/docs/security/firesight/541/firepower-module-user-guide/asa-firepower-module-user-guide-v541/AC-Rules-Tuning-Overview.pdf		Authentication, and hearsay.
DX-152		Undated	Cisco, "What Is a Firewall," available at http://www.cisco.com/c/en/us/products/security/firewalls/what-is-a-firewall.html		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-153		6/28/2010	Clarke, G., "Rancid IE6 'more secure' than Chrome and Opera US bank," The Register, available at https://www.theregister.co.uk/2010/06/28/chase_ie_6.dumps_chrome_oper/		Authentication, and hearsay.
DX-154		3/6/2008	ComputerWeekly, "How to spot a Cisco fake," available at http://www.computerweekly.com/news/2240085270/How-to-spot-a-Cisco-fake		Authentication, and hearsay.
DX-155		9/23/2014	Cook, S., and Soramaki, K., "The Global Network of Payment Flows," SWIFT Institute Working Paper No. 2012-006, available at https://www.swiftinstitute.org/wpcontent/uploads/2014/09/SWIFT-Institute-Working-Paper-No.-2012-006-Network-Analysisof-Global-Payment-Flows_v5-FINAL.pdf		Authentication, and hearsay.
DX-156		12/7/2001	DeFrance, F., "A Case for Centralized Logging," available at http://ebuzzsaw.com/whitePapers/Case_for_CentralizeLogging.htm		Authentication, and hearsay.
DX-157		5/4/2005-5/6/2005	Delalleau, G., "Large memory management vulnerabilities," CancSecWest 2005, available at https://cansecwest.com/core05/memory_vulns_delalleau.pdf		Authentication, and hearsay.
DX-158		5/6/2015	Foeckl, R., "Why Geofencing will become the next endpoint security innovation," SC Media, available at https://www.scmagazineuk.com/why-geofencing-will-become-the-next-endpoint-security-innovation/article/537168/		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-159		11/2015	FTC, "Malware," available at https://www.consumer.ftc.gov/articles/0011-malware		Authentication, and hearsay.
DX-160		Undated	Gartner, "About Gartner," available at http://www.gartner.com/technology/about.jsp		Authentication, and hearsay.
DX-161		Undated	Gemalto, "Out-of-Band Authentication," available at https://safenet.gemalto.com/multi-factor-authentication/authenticators/out-of-band-authentication/		Authentication, and hearsay.
DX-162		8/2006	Hammer, R., Reverse Shells Enable Attackers to Operate from Your Network, available at https://www.sans.edu/student-files/presentations/LVReverseShell.pdf		Authentication, and hearsay.
DX-163		2014	Hammerberg, D., "Best Defenses Against Zero-day Exploits for Various-sized Organizations," available at https://www.sans.org/reading-room/whitepapers/bestprac/defenses-zeroday-exploits-various-sized-organizations-35562		Authentication, and hearsay.
DX-164		Undated	Imperva Incapsula, "Man in the Middle (MITM) Attack," available at https://www.incapsula.com/web-application-security/man-in-the-middle-mitm.html		Authentication, and hearsay.
DX-165		11/4/2014	InfoSec Institute, "ICMP Reverse Shell," available at http://resources.infosecinstitute.com/icmp-reverse-shell/#gref		Authentication, and hearsay.
DX-166		2/22/2016	iTunes, "Google Authenticator," available at https://itunes.apple.com/us/app/googleauthenticator/id388497605?mt=8		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-167		5/16/2016	John Leyden, <i>Inter-bank system SWIFT on security? User manual needs 'revamp'</i> , The Register, http://www.theregister.co.uk/2016/05/16/swift_security_control_need_revamp/		Authentication, and hearsay.
DX-168		4/24/2014	Juniper Networks, "Understanding Point-to-Point Protocol," available at https://www.juniper.net/documentation/en_US/junos12.1x47/topics/concept/interface-security-encapsulation-point-to-point-protocol-understanding.html		Authentication, and hearsay.
DX-169		5/2013	Kissel, Richard, ed. "Glossary of Key Information Security Terms," National Institute of Standards and Technology, available at http://nvlpubs.nist.gov/nistpubs/ir/2013/NIST.IR.7298r2.pdf		Authentication, and hearsay.
DX-170		6/20/2011	Krebs on Security, "Software Cracks: A Great way to infect your PC," June 2011, available at https://krebsonsecurity.com/2011/06/software-cracks-a-great-way-to-infect-your-pc/		Authentication, and hearsay.
DX-171		10/2012	Leibbrandt, G., "A Billion Here, A Billion There: The Statistics of Payments," The Swift Institute, available at https://swiftinstitute.org/wpcontent/uploads/2012/10/The-Statistics-of-Payments_v15.pdf		Authentication, and hearsay.
DX-172		8/21/2016	Lifewire, "Introduction to Intrusion Detection (IDS)," available at https://www.lifewire.com/introduction-to-intrusion-detection-systems-ids-2486799		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-173		9/22/2016	Lifewire, "What is a Registry Value?," available at https://www.lifewire.com/what-is-a-registryvalue-2626042		Authentication, and hearsay.
DX-174		3/30/2016	Malwarebytes, "What is Host Intrusion Prevention System (HIPS) and how does it work?," available at https://blog.malwarebytes.com/101/2013/05/whatiships/		Authentication, and hearsay.
DX-175		9/16/2008	Market Wired, "BankServ Introduces SWIFT Service Bureau for Corporates to Enhance Payment and Treasury Operations," available at http://www.marketwired.com/press-release/bankserv-introduces-swift-service-bureaucorporates-enhance-payment-treasury-operations-900177.htm		Authentication, and hearsay.
DX-176		11/14/2014	Microsoft, "Microsoft Security Intelligence Report," January through June, 2014, available at https://www.microsoft.com/en-us/download/details.aspx?id=44937		Authentication, and hearsay.
DX-177		10/14/2016	Microsoft, "Role Based Authorization," available at https://docs.microsoft.com/en-us/aspnet/core/security/authorization/roles		Authentication, and hearsay.
DX-178		6/30/2011	Microsoft, "What should I know about password policies?," available at https://technet.microsoft.com/en-us/library/password-policy-1(v=ws.11).aspx		Authentication, and hearsay.
DX-179		7/1/2016	Nave, K. "Inforporn: how VPN use varies by country," Wired, available at http://www.wired.co.uk/article/vpn-use-worldwide-privacy-censorship		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-180		7/8/2015	Network Working Group, "The Transport Layer Security (TLS) Protocol Version 1.3 draft-ietf-tls-tls13-07," available at https://tools.ietf.org/html/draft-ietf-tls-tls13-07		Authentication, and hearsay.
DX-181		9/20/2016	Banco del Austro, S.A., Cobertura, available at https://www.bancodelaustro.com/Portals/0/documentos/Agencias-Banco-del-Austro-Sep-2016.pdf		Authentication, and hearsay.
DX-182		2000	Parlante, N., "Pointers and Memory," Stanford CS Education Library, available at http://cslibrary.stanford.edu/102/PointersAndMemory.pdf		Authentication, and hearsay.
DX-183		Undated	PCTools by Symantec, "What is a keylogger?," available at http://www.pctools.com/securitynews/what-is-a-keylogger/		Authentication, and hearsay.
DX-184		10/3/2016	Puleo, S., "Geo-fencing: securing authentication?," Micro Focus, available at https://blog.microfocus.com/geo-fencing-securing-authentication-2/		Authentication, and hearsay.
DX-185		7/20/2017	Python, "Using the Python Interpreter," available at https://docs.python.org/3/tutorial/interpreter.html		Authentication, and hearsay.
DX-186		Undated	Python, "What is Python? Executive Summary," available at https://www.python.org/doc/essays/blurb/		Authentication, and hearsay.
DX-187		6/19/2017	Qualys, "The Stack Clash," available at https://blog.qualys.com/securitylabs/2017/06/19/the-stack-clash		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-188		11/30/2016	Ramirez, E., "South Korea's Online Banking System Is Stuck In 1996," Forbes, available at https://www.forbes.com/sites/elaineramirez/2016/11/30/south-koreasonline-banking-system-is-stuck-in-1996/#3df6d7b3527c		Authentication, and hearsay.
DX-189		Undated	RSA, About Us, https://www.rsa.com/en-us/company/about-rsa		Authentication, and hearsay.
DX-190		2/16/2016	RSA SECURID, "Hardware Tokens," available at https://www.rsa.com/content/dam/rsa/PDF/h13821-ds-rsa-securid-hardware-tokens.pdf		Authentication, and hearsay.
DX-191		1/26/2016	Sahanee, R., "Keylogger in C/C++," available at http://zattackcoder.com/keylogger-in-c/		Authentication, and hearsay.
DX-192		6/2/2008	SANS Institute, "Host Intrusion Prevention Systems and Beyond," available at https://www.sans.org/reading-room/whitepapers/intrusion/host-intrusion-prevention-systems-32824		Authentication, and hearsay.
DX-193		2010	Scott, S., and Zachariadis, M, "A historical analysis of core financial services infrastructure: Society for Worldwide Interbank Financial Telecommunications (SWIFT)," London School of Economics and Political Science, LSE Library		Authentication, and hearsay.
DX-194		Undated	SecurEnvoy, "What is 2FA?," available at https://www.securenvoy.com/two-factor-authentication/what-is-2fa.shtml		Authentication, and hearsay.
DX-195		5/31/2012	Sophos, "Understanding PortScan Detection," available at https://community.sophos.com/kb/enus/115153		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-196		12/17/2014	Soprano, "How two-factor authentication benefits both you and your customers," available at https://www.sopranodesign.com/two-factor-authentication-benefitscustomers/		Authentication, and hearsay.
DX-197		6/2/2017	Stanford University, "VPN (Virtual Private Network)," available at https://uit.stanford.edu/service/vpn		Authentication, and hearsay.
DX-198		Undated	StatCounter GlobalStats, available at http://gs.statcounter.com/		Authentication, and hearsay.
DX-199		10/1/2015	Stewart, J., "How False Rejections Cost More Than Actual Fraud," Digital Transactions, available at http://www.digitaltransactions.net/index.php/news/story/How-False-Rejections-Cost-More-Than-Actual-Fraud		Authentication, and hearsay.
DX-200		Undated	SWIFT, Alliance Access, https://www.swift.com/our-solutions/interfaces-and-integration/alliance-access#topic-tabs-menu		Authentication, and hearsay.
DX-201		4/12/2017	SWIFT Announces New Payment Controls Service to Bolster Customers' Fraud and Cyber-Crime Controls, https://www.swift.com/news-events/press-releases/swift-announces-new-payment-controls-service-to-bolster-customers_fraud-and-cyber-crime-controls		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-202		9/20/2016	SWIFT Announces New Security Tool to Strengthen Customer Fraud Controls, https://www.swift.com/insights/press-releases/swift-announces-new-security-tool-to-strengthen-customer-fraud-controls		Authentication, and hearsay.
DX-203		8/25/2017	SWIFT, "BIC Policy," available at https://www2.swift.com/uhbonline/books/public/en_uk/bic_policy/index.htm		Authentication, and hearsay.
DX-204		9/1/2015	SWIFT, Compliance Analytics, https://www.swift.com/file/326/download?token=fnfm5itd		Authentication, and hearsay.
DX-205		12/25/2014	SWIFT Compliance Analytics, available at https://web.archive.org/web/20141225065637/http://complianceservices.swift.com:80/compliance-analytics		Authentication, and hearsay.
DX-206		11/9/2016	SWIFT, Executive Summary of SWIFT's Response to the Belgian Privacy Commission's Advisory Opinion 37/2006 of 27 September 2006, https://www.swift.com/file/14211/download?token=BnADiugx		Authentication, and hearsay.
DX-207		12/18/2015	SWIFT Handbook Glossary, https://www2.swift.com/uhbonline/books/public/en_uk/udic/index.htm		Authentication, and hearsay.
DX-208		Undated	SWIFT, "SWIFT History," available at https://www.swift.com/about-us/history		Authentication, and hearsay.
DX-209		5/10/2017	SWIFT in Figures, April 2017 YTD, https://www.swift.com/file/40821/download?token=KSmt35Jl		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-210		4/29/2014	SWIFT Launches Compliance Analytics Service to Help Banks Manage Financial Crime Risk, https://www.swift.com/news-events/press-releases/swift-launches-compliance-analytics-service-to-help-banks-manage-financial-crime-risk		Authentication, and hearsay.
DX-211		Undated	SWIFT, "Messaging and Standards," available at https://www.swift.com/about-us/discover-swift/messaging-standards		Authentication, and hearsay.
DX-212		Undated	SWIFT, "Monthly FIN Traffic Evolution," available at https://www.swift.com/about-us/swift-fin-traffic-figures		Authentication, and hearsay.
DX-213		1/1/2015	SWIFT, "Monthly FIN Traffic Figures: Jan-15," available at https://www.swift.com/about-us/swift-fin-traffic-figures/monthly-figures		Authentication, and hearsay.
DX-214		Undated	SWIFT Online BIC Search, https://www2.swift.com/bsl/		Authentication, and hearsay.
DX-215		Undated	SWIFT, "Ordering a Logical Terminal (LT)," available at https://www.swift.com/myswift/ordering/order-products-services/logical-terminal-lt_		Authentication, and hearsay.
DX-216		Undated	SWIFT, Service Bureau Directory, available at https://www.swift.com/about-us/partner-programme/service-bureau-directory/service-bureau-directory		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-217		11/6/2006	SWIFT Supports Calls for Debate to Move Beyond Data Privacy to Security and Public Safety, available at https://www.swift.com/insights/press-releases/swift-supports-calls-for-debate-to-move-beyond-data-privacy-to-security-and-public-safety		Authentication, and hearsay.
DX-218		4/2014	Symantec, "Internet Security Threat Report," available at http://www.symantec.com/content/en/us/enterprise/other_resources/bistr_main_report_v19_21291018.en-us.pdf		Authentication, and hearsay.
DX-219		4/2016	Symantec, "Internet Security Threat Report," available at https://www.symantec.com/content/dam/symantec/docs/reports/istr-21-2016-en.pdf		Authentication, and hearsay.
DX-220		Undated	Symantec, "What is a Zero-Day Vulnerability?," available at http://www.pctools.com/securitynews/zero-day-vulnerability/		Authentication, and hearsay.
DX-221		Undated	Techopedia, "Air Gap," available at https://www.techopedia.com/definition/17037/air-gap		Authentication, and hearsay.
DX-222		Undated	Techopedia, "Network-based Intrusion Prevention System (NIPS)," available at https://www.techopedia.com/definition/4030/network-based-intrusion-prevention-systemnips		Authentication, and hearsay.
DX-223		Undated	Techopedia, "Port Scanner," available at https://www.techopedia.com/definition/13076/portscanner		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-224		Undated	Techopedia, "Sniffer," available at https://www.techopedia.com/definition/4113/sniffer		Authentication, and hearsay.
DX-225		Undated	Techopedia, "Spoofing," available at https://www.techopedia.com/definition/5398/spoofing		Authentication, and hearsay.
DX-226		Undated	Techopedia, "Transmission Control Protocol (TCP)," available at https://www.techopedia.com/definition/5773/transmission-control-protocol-tcp		Authentication, and hearsay.
DX-227		1/2/2012	TechRepublic, "Controlling your network using Network Access Control," available at http://www.techrepublic.com/blog/it-security/controlling-your-network-using-network-access-control/		Authentication, and hearsay.
DX-228		12/2016	TechTarget, "two-factor authentication (2FA)," available at http://searchsecurity.techtarget.com/definition/two-factor-authentication		Authentication, and hearsay.
DX-229		Undated	Techwalla, "Client Server Architecture Advantages & Disadvantages," available at https://www.techwalla.com/articles/client-server-architecture-advantages-disadvantages		Authentication, and hearsay.
DX-230		Undated	Techwalla, "What Are the Differences Between Logical & Physical Access to the Computer?," available at https://www.techwalla.com/articles/what-are-the-differences-between-logical-physical-access-to-the-computer		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-231		6/2014	“Tendencias de Seguridad Cibernética de América Latina y el Caribe,” Organización de los Estados Americanos, available at https://www.symantec.com/content/es/mx/enterprise/other_resources/b-cyber-securitytrends-report-lamc.pdf		Authentication, and hearsay.
DX-232		Undated	US-CERT, “About Us,” available at https://www.us-cert.gov/about-us		Authentication, and hearsay.
DX-233		10/7/2016	US-CERT, Alert TA13-175A, “Risks of Default Passwords on the Internet,” available at https://www.us-cert.gov/ncas/alerts/TA13-175A		Authentication, and hearsay.
DX-234		5/25/2001	U.S. Department of Commerce, “Security Requirements for Cryptographic Modules,” Information Technology Library, National Institute of Standards and Technology, available at http://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.140-2.pdf .		Authentication, and hearsay.
DX-235		Undated	Veil-Framework, “The Veil-Framework,” available at https://www.veil-framework.com/framework/		Authentication, and hearsay.
DX-236		3/23/2009-3/25/2009	Watts, K., and Oman, P., “Stack-Based Buffer Overflows in Harvard Class Embedded Systems,” Critical Infrastructure Protection III - Third Annual IFIP WG 11.10 International Conference on Critical Infrastructure Protection, Hanover, New Hampshire, USA, Revised Selected Papers		Authentication, and hearsay.

Defendant's Exhibit No.	Original Designation	Date	Description	Bates Range	Objection(s)
DX-237		12/14/2015	Webopedia, "Well-Known TCP Port Numbers," available at http://www.webopedia.com/quick_ref/portnumbers.asp		Authentication, and hearsay.
DX-238		11/1976	Whitfield Diffie & Martin E. Hellman, New Directions in Cryptography, available at http://math.boisestate.edu/~liljanab/MATH308/NewDirectionsCryptography.pdf		Authentication, and hearsay.
DX-239		8/17/2010	Wojtczuk, R., "Exploiting large memory management vulnerabilities in Xorg server running on Linux," Invisible Things Lab, available at http://www.invisiblethingslab.com/resources/misc-2010/xorg-large-memory-attacks.pdf		Authentication, and hearsay.